

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 43

*Plaintiff,*

v.

JEFFREY EPSTEIN, GHISLAINE MAXWELL,  
SARAH KELLEN, LESLEY GROFF and  
NATALYA MALYSHEV

*Defendants.*

No. 17 Civ. 00616 (JGK)

**MEMORANDUM IN OPPOSITION TO LETTER MOTION TO OPPOSE  
ALTERNATIVE SERVICE ON MAXWELL**

**REDACTED**

**Conclusion**

The motion for the Court to reconsider its order should be denied.

Dated: November 13, 2017

Respectfully submitted,

FARMER, JAFFE, WEISSING,  
EDWARDS, FISTOS&LEHRMAN, P.L.

/s/ Bradley J. Edwards

Bradley J. Edwards  
425 North Andrews Avenue, Suite 2 Fort  
Lauderdale, Florida 33301  
Tel: (954) 524-2820 Fax: (954) 524-2822  
Email: brad@pathtojustice.com  
Attorney for Plaintiff Jane Doe 43

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 13th of November, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

Kimo S. Peluso  
Sher Tremonte, LLP  
90 Broad Street, 23<sup>rd</sup> Floor  
New York, NY 10004  
kpeluso@shertremonte.com

*Counsel for Haddon, Morgan & Foreman, P.C.*

Laura A. Menninger, Esq.  
Jeffrey Pagliuca, Esq.  
HADDON, MORGAN & FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, Colorado 80203  
Tel: (303) 831-7364  
Fax: (303) 832-2628  
Email: [lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)  
[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)

Michael C. Miller  
1114 Avenue of the Americas  
New York, NY 10036  
mmiller@steptoie.com  
Counsel for Defendants, Jeffrey Epstein and Lesley Groff

/s/ Bradley J. Edwards